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ESTTA668661 04/24/2015

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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221085
Party	Defendant FOAMCRAFT, INC.
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Submission	Answer
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Date	04/24/2015
Attachments	foamcraft answer opposition.pdf(54924 bytes )

## OPPOSITION PROCEEDING NO. 91221085

J&G Marketing of South Florida, Inc.

V.

FOAMCRAFT, INC.

## FOAMCRAFT, INC.'S ANSWER TO OPPOSITION

Foamcraft, Inc., by counsel, for its answer to the opposition, alleges and states:

- 1. Foamcraft denies the existence of a false suggestion of a connection under Section 2(a) of the Trademark Act.
- 2. Foamcraft denies priority and a likelihood of confusion under Section 2(d) of the Trademark Act.
- 3. Foamcraft denies dilution under Section 43(c) of the Trademark Act.
- 4. Foamcraft denies unfair competition under 15 USC § 1125(a) and the common law.

Foamcraft prays that J&G take nothing by its opposition, that the Board rejects denies the opposition, and that the Board accept Foamcraft's application for registration.